

OCAN DRAFT

10CFR50.54(q)

August XX, 2002

U. S. Nuclear Regulatory Commission
Document Control Desk
Mail Station OP1-17
Washington, DC 20555

Subject: Arkansas Nuclear One – Units 1 and 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6
Proposed Emergency Plan Change – Supplemental Information

Dear Sir or Madam:

Entergy Operations, Inc. (Entergy) submitted a proposed change to the Arkansas Nuclear One (ANO) Emergency Plan on August 22, 2001 (OCAN080103) for an extension in the response times for augmentation of the on-shift staff with additional personnel in the event of an emergency. This submittal was supplemented by our letter of July 9, 2002 (OCAN070201) which provided responses to an NRC Request for Additional Information (RAI).

During a teleconference with Mr. Tom Alexion and Mr. Robert Moody of your staff conducted on August 12, 2002, additional information and clarification pertaining to our proposed Emergency Plan change was requested by the staff. Specifically, the reviewers requested clarification of ANO's proposed plan revision regarding the number and qualifications of Nuclear Chemists assigned to the shift organization. Also, an addition to the proposed plan was requested that would reflect ANO's existing operational goal for the Emergency Operational Facility (EOF). Accordingly, Entergy proposes the following revisions:

- ANO proposes to add a footnote to Table B-1 of the Emergency Plan to clearly indicate that the shift organization includes two Nuclear Chemists, each being qualified to perform offsite dose projections and chemistry/radiochemistry functions for either unit.
- ANO proposes to add to the Emergency Plan, Section H, a discussion of our goal for the EOF to be operational within 60 – 90 minutes of an Alert or higher emergency class declaration. This goal is currently contained in the Emergency Plan Implementing Procedures and is an operational goal which is designed to enhance the capability to augment the shift organization as soon as possible. The proposed requirement for the EOF to be operational will continue to be within approximately 90 minutes of a Site Area Emergency or General Emergency declaration.

The attachment to this letter contains the proposed marked-up Emergency Plan pages associated with the items above. These changes constitute a revision to our original proposal of August 22, 2001, as supplemented by our July 9 2002 letter.

Additionally, the following is provided in response to a request for information regarding the content of the initial training program for the Shift Engineers, specifically with respect to expertise in the areas of electrical and mechanical technical support.

- Prerequisites for individuals selected for assignment to the shift organization as Shift Engineers/Shift Technical Advisors (SE/STA) specify that they should hold a Bachelor's degree in Engineering, Engineering Technology, or Physical Science from an accredited institution; or a Bachelor's degree in a technical discipline which includes coursework specified by ANO Training procedures. Exemptions to prerequisites are evaluated on a case by case basis and are dependent on an assessment of a candidate's previous training and experience.
- The initial SE/STA program is designed to compliment the candidate's degree in Engineering or Physical Science and includes coursework in the following topics that are pertinent to this information request:

- Electrical theory
 - Motors and Generators
 - Electrical Switchgear
 - Electrical Print Reading

- Pump Construction, Application, & Operation
 - Valve Construction, Application & Operation
 - Heat Exchanger Theory & Construction
 - Ion Exchangers
 - Material Science
 - Piping and Instrument Diagrams

If you have any questions or require additional information, please contact me. This submittal contains no new commitments.

Sincerely,

Sherrie R. Cotton
Director, Nuclear Safety Assurance

SRC/fpv
Attachment

cc:

Mr. Ellis W. Merschoff
Regional Administrator
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-8064

NRC Senior Resident Inspector
Arkansas Nuclear One
P.O. Box 310
London, AR 72847

Mr. William Reckley
NRR Project Manager Region IV/ANO-1
U. S. Nuclear Regulatory Commission
NRR Mail Stop O-7 D1
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

Mr. Thomas W. Alexion
NRR Project Manager Region IV/ANO-2
U. S. Nuclear Regulatory Commission
NRR Mail Stop 04-D-03
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

Attachment

Proposed Revision to ANO Emergency Plan Table B-1 & Section H

TABLE B-1

MINIMUM STAFFING REQUIREMENTS
(Including Capability for Additional Staffing)

<u>MAJOR FUNCTIONAL AREA</u>	<u>POSITION/TITLE or EXPERTISE</u>	<u>ON-SHIFT¹</u>		<u>AVAILABLE³ IN 60 MIN</u>	<u>AVAILABLE³ IN 90 MIN</u>
		<u>U-1</u>	<u>U-2</u>		
Plant Operations	Shift Manager (SRO) ⁴	1	1	-	-
	Control Room Supervisor (SRO)	1	1	-	-
	Control Room Operators	2	2	-	-
	Auxiliary Operators	2	2	-	-
	Shift Technical Advisor (Shift Engineer) ⁷	1	1	-	-
	Waste Control Operator (Radwaste)	1	1	-	1
Emergency Direction and Control (Emer. Coord.) ⁴		1	1	-	2
Notification/ Communication ²	Communicator ⁸	1	1	-	-
	Control Room/TSC/EOF Communications Personnel	-	-	-	2
Radiological Accident Assessment and Support of Operational Accident Assessment, and Protective Actions (in plant)	Dose Assessment Supervisor	-	-	-	1
	-Health Physics Technician (Onsite and Offsite Surveys)	1	1	4	4
	-Nuclear Chemists (Offsite Dose Projections)	1 ¹⁰	1 ¹⁰	1	-
	-Health Physics Technicians (Protective Actions-In Plant)	3 ²	3 ²	2	2
Chemistry/Radiochemistry	Nuclear Chemists	1 ¹⁰	1 ¹⁰	-	1

TABLE B-1 (Continued)

GROUP	POSITION/TITLE	ON-SHIFT		AVAILABLE ³	AVAILABLE ³
		U-1	U-2	IN 60 MIN	IN 90 MIN
Repair and Corrective Actions	-Electrical Maintenance	3 ²	3 ²	1 ⁵	1 ⁵
	-I&C Technician	-	-	1 ⁶	1 ⁶
	-Mechanic	3 ²	3 ²	-	2
Plant System Engineering	Core/Thermal Hydraulics	1 ⁹	1 ⁹	1	-
	Electrical Engineer	-		-	1
	Mechanical Engineer	-		-	1
Firefighting	---	Unit 1 SAR, Sec. 9.8 Unit 2 SAR, App. 9A		Local Support (30 Minute Response)	
Rescue Operations and First-Aid	---	2 ²		Local Support (30 Minute Response)	
Site Access Control and Personnel Accountability	Security Personnel	All per Security Plan			

TABLE B-1 (Continued)

¹ These ERO positions may be vacant for not more than two hours, in order to provide for unexpected absences, provided immediate action is taken to fill the required position

² May be provided by shift personnel assigned other functions.

³ Once notified, emergency responders are to report to their assigned facility as soon as possible and without delay.

⁴ The Shift Manager initially assumes the responsibility for Emergency Direction and Control, then is relieved by the TSC Director or EOF Director.

⁵ Electrical Maintenance personnel.

⁶ I&C Maintenance personnel.

⁷ The duties of the Shift Technical Advisor are performed by the Shift Engineer of the affected unit.

⁸ The duties of the Communicator are performed by the Shift Engineer of the unaffected unit.

⁹ STA duties encompass the Core/Thermal Hydraulics function.

¹⁰ There are two Nuclear Chemists on shift qualified to perform offsite dose projections and chemistry/radiochemistry functions for either unit.

1.3 OPERATIONAL SUPPORT CENTER

An Operational Support Center (OSC) is provided in the ANO Maintenance Facility from which ANO personnel function to assist the Operations staff in the Control Room. It is used for assembling the plant emergency response teams and other ANO personnel. If it becomes necessary to evacuate the Operational Support Center due to radiation or other hazards, a secondary OSC is provided in the Emergency Operations Facility.

The OSC is activated at the Alert Emergency Class. The estimated time of activation for either Operational Support Center is approximately 90 minutes.

1.4 EMERGENCY OPERATIONS FACILITY

The Emergency Operations Facility is located approximately 0.65 miles northeast of the Reactor Buildings. It serves as the alternate location for the Technical Support Center and the Operational Support Center should these centers be evacuated. The location of the Emergency Operations Facility and evacuation routes from the plant to the Emergency Operations Facility are shown in Figure J-4.

The goal is for the EOF to be operational within 60-90 minutes of an Alert or higher emergency class declaration. The EOF is required to be staffed and operational within approximately 90 minutes of the declaration of a Site Area Emergency or General Emergency.

The Emergency Operations Facility also serves as the primary location for the following functions:

- 1) coordination between ANO and non-ANO groups, such as the Arkansas Department of Health;
- 2) an emergency news center for coordinating the release of information to the media;
- 3) a central point for coordinating all ANO offsite radiological monitoring activities at the time of an incident; and
- 4) the primary location for coordinating both technical and non-technical support activities of personnel brought in to assist ANO personnel.